

Suzanne Naughton  
Marisa for Senate  
3800 Bridgeport Way W Ste A #198  
suzanne@bluewavepolitics.com

January 4, 2017  
Public Disclosure Commission  
pdc@pdc.wa.gov

Re: Alleged Violation of RCW 42.17A.235 and .240

To Whom It May Concern:

This letter responds to the complaint from Mr. Glen Morgan that the Commission received on December 12, 2016. Mr. Morgan alleges that Marisa for Senate violated reporting requirements. While this campaign was unsuccessful, we remain committed to transparency and accuracy as we prepare to close the committee. Below I address each of the alleged violations identified in Mr. Morgan's complaint.

**1. David McInturff employer and occupation.**

Online and printed contribution forms for this campaign required each donor to provide his or her employer and occupation information. On March 24, Mr. McInturff's gave a contribution by check and indicated to the campaign that his employment status was "Retired." He retired from a full-time position at University Place School District, and since that time has accepted a part-time position at Tacoma Community College.

**2. Samish Tyee employer and occupation.**

Samish Tyee is a tribal entity and therefore has no employer or occupation.

**3. Mari Leavitt employer and occupation.**

On April 18, Ms. Leavitt gave online and indicated her employer as "Pierce County" and occupation as "Gov. Exec." (receipt attached). In an effort toward uniformity in all campaign reports, her employer was reported as "Pierce County" and her occupation as "Executive."

**4-8. Reporting other employers and occupations.**

Thomas Camp donated three times throughout the campaign. Mr. Camp first donated \$100 on April 6, 2016. Mr. Camp later donated \$100 on August 16, and other \$250 on September 8. Unfortunately, Mr. Camp's occupation and employer information was not listed in the C3 report that was filed for his second contribution. However, it was reported for this third contribution.

At the beginning of the campaign, we used ORCA to electronically file C3 reports. After the primary election, the campaign switched to a software program called "NGP" for reporting. As

treasurer, I moved the previous contribution information from ORCA to NGP to ensure aggregate contribution information was retained for all future reports filed through NGP. The individuals Mr. Morgan listed (Thomas Camp, Kelly Evans, Erik Flint, Dorothy McBride, and Charles Upshaw) each gave once during the primary election. These contributions were reported through ORCA. The second contribution from each of these individuals was reported through NGP. It appears that while the transfer of data from ORCA to NGP did retain contribution totals and contributor information, the filing software did not recognize the first donation as part of the \$100 aggregate from the beginning of the campaign. Therefore, the occupation and employer information—which had been collected as shown by Thomas Camp’s third donation—was not included on the report.

We will amend the relevant C3 reports to ensure that these individuals who gave more than \$100 in the aggregate from the beginning of the campaign show occupation and employer information for their donations later in the election cycle.

#### **9. Failure to accurately report media buys.**

The campaign made three expenditures for media buys throughout October (invoices attached). At the time these expenditures were required to be disclosed on the C4 report, the information available was the date purchased, broker name, and total amount. We have obtained the run dates of the advertisements and the breakdown of each media outlet since the original reports were filed.

We appreciate the opportunity to amend the relevant C4 reports for all three media buys, including one that was not identified in Mr. Morgan’s complaint to fully ensure transparency.

#### **10. Purchase of web domain name.**

The campaign domain was originally registered on the campaign’s behalf by a consultant. This purchase was included in their consulting fee (invoice attached). This fee was originally reported as “Website” on the C4 report covering March 1 to March 31 as debt. The invoice was paid on April 26 and reported as a “Consulting” expenditure on the C4 report covering April 1 to April 30. To err on the side of disclosure, we will amend the April C4 report to show “Website” in the purpose of the expense.

Thank you for the opportunity to address Mr. Morgan’s complaint. Please let us know if there is any further information we can provide.

Sincerely,

Suzanne Naughton  
Campaign Treasurer